



MURIEL GOODE-TRUFANT
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

DANIEL R. PEREZ
Phone: (212) 356-0877
Fax: (212) 356-1148
danipere@law.nyc.gov
(not for service)

April 2, 2025

VIA ECF

Honorable James R. Cho
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *L.B. v. City of New York et al*, 1:23-CV-08501 (RPK) (JRC)

Your Honor:

I am the Assistant Corporation Counsel in the Office of the Corporation Counsel of the City of New York assigned to represent Defendants City of New York and Jess Dannhauser, in his official capacity as Commissioner of the New York City Administration of Children's Services ("ACS"), Ariel Semper, Nadine Cenord, Bernadet Jean-Louis, Donna McFadden, Ana Costa, Taiesha Coleman, and Leydi Taveras in this matter. I write to respectfully request the extension of Defendants' time to answer the Amended Complaint (ECF No. 37) from today, April 2, 2025, until April 9, 2025.

I am seeking the requested one-week extension to obtain additional time to discuss Defendants' forthcoming Answer with ACS and the individual Defendants. Unfortunately, due to the need to prepare Rule 30(b)(6) designees in another matter for a deposition on April 4, 2025, I have had limited availability to speak with the Defendants regarding the Answer since the issuance of the Court's March 12, 2025, Order (ECF No. 52) with respect to Defendants' Motion to Dismiss (ECF No. 40). This is Defendants' first request for an extension of time to answer the Amended Complaint and the requested extension will not require any further alterations to the schedule in this matter. Plaintiffs consent to the requested extension based on the understanding that the extension will not impact the rest of the schedule.

Defendants thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Daniel R. Perez

Daniel R. Perez
Assistant Corporation Counsel